

## **DRAFT LIST OF REVISED FS ISSUES NEEDING RESOLUTION BY AUGUST 5 FOR EPA CONSIDERATION**

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At the July 8, 2014 revised FS technical meeting, the LWG agreed to generate a draft list of outstanding issues that need to be resolved by the August 5, 2014 technical meeting. This draft list is being provided for EPA consideration and comment. The goal is to develop a final list that both the LWG and EPA endorse. The FS revision process matrix (submitted to EPA each Friday) indicates that all Section 3 information will be understood and resolved (as necessary) by early August. The August 5<sup>th</sup> meeting is intended to discuss the last portions of Section 3 regarding alternative screening and selection of alternatives for detailed evaluation in Section 4. The list provided below focuses on those items that are needed to complete the alternative selection process in Section 3 and allow discussion of the alternative evaluation process in Section 4.

List of items needed to complete Section 3 discussions:

1. Final decisions on **Preliminary Remediation Goals (PRGs)** (i.e., a final PRG table showing PRGs for each Remedial Action Objective).
2. Determination of any **technology evaluation methods** (i.e., for dredging, capping, Enhanced Monitored Natural Recovery, or in-situ treatment) needed to determine the feasible application of that technology to various portions of the Site.
3. Methods for **identification and selection of technologies** (e.g., EPA's technology identification decision matrix and resulting "pixel" map).
  - a. Methods for refining or smoothing pixel map technology selections into feasible subareas of technology application within each Sediment Management Area (SMA). This should resolve issues related to so called "subSMA changes" from the draft FS.
4. Final decisions **on Remedial Action Levels (RALs) and comprehensive benthic risk areas (CBRAs)** to be used to define SMAs.
  - a. EPA has indicated this might include options using different sets of RALs (e.g., draft FS RALs vs. EPA revised RALs) that might be evaluated and compared in the alternatives selection process.
  - b. EPA has indicated no recent revisions to the CBRA, but has not confirmed that the current CBRAs are final.
5. Methods for defining **Sediment Decision Units (SDUs)**, which appears to be completed. And methods for evaluating SDUs, which EPA indicated it is still working on.
  - a. SDU evaluation is expected to include some determination that PRGs are adequately addressed (e.g., time zero surface area weighted average concentrations [SWAC] calculations) through focus on the SDUs.

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- b. How the SDU analysis will be used in the RAL and SMA development discussion needs to also be resolved.
6. The use of **equilibrium values** (instead of upstream bedded sediment background values) in the revised FS. The LWG submitted a proposal for use of equilibrium values to EPA.
  - a. EPA has indicated interest in equilibrium values for some FS uses, and LWG has recommended their use for PRG selection, SWAC estimates, and alternatives evaluations. Any uses related to PRGs or SWAC estimates (e.g., SDU evaluations) in Section 3 need to be resolved.
7. **Source material (preference for removal)** methodologies and how technologies will be assigned for alternatives within any source material areas.
  - a. The LWG submitted a response on preference for removal to EPA on July 21, 2014.
8. How **Oregon Hot Spot** regulations will be addressed in the revised FS. We understand that DEQ has ceased work on a Hot Spot identification for Portland Harbor. But the LWG is unclear on how EPA intends to address compliance (or waiving) of substantive requirements of this regulation and how this will be described in the revised FS.
9. Methods for **mapping SMAs** based on the final RALs. EPA has indicated several method differences for applying the RALs to determine SMA footprints. The LWG has not been able to reproduce these SMAs to date, and some reproducible description of the mapping methods is needed.
  - a. Per Item 4a, sets of SMA options to be evaluated for alternative screening and selection need to be defined.
10. Any methods and results of **buried contamination evaluations**. Areas of buried contamination that are not addressed by application of RALs to surface sediment need to be defined and added to the SMAs (as necessary) so that the complete extent of the SMAs is known for technology applications, alternatives screening, and alternative selection.
  - a. EPA has recently requested some additional graphics to help support this analysis. The LWG is currently considering the feasibility and timeline for producing such graphics.
11. The **assignment of disposal sites** to each alternative screened. EPA has indicated that all alternatives will assume upland disposal.
  - a. EPA has also indicated that “options” for Confined Disposal Facility (CDF) disposal will be included in some alternatives. The extent to which options will be identified and characterized such that they do not constitute full additional alternatives needs to be described.

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12. Any **changes to CDF evaluation or characterization methods** need to be defined. For example, EPA has requested additional information on CDFs but it is unclear how this information will play into disposal option descriptions or alternatives development in the revised FS.
13. Any changes to **depth of impact (DOI), dredge depth or volume estimates**. EPA provided a draft memo describing some alternate methods for these estimates. The LWG responded to this memo with some recommendations.
  - a. EPA indicated that alternate methods for DOI, dredge depth or volume will only be presented as a comparative analysis. Confirmation is needed that RALs will be used as the primary method to define alternatives. Description is also needed regarding how the alternate methods will be described and used in the revised FS in any comparative analysis.
14. Methods for **identification, screening, and selection of alternatives** for detailed evaluation need to be described.

Also, normally **Principle Threat Waste (PTW)** issues would also be resolved as part of alternative screening and selection. The LWG plans to submit a response to EPA's PTW identification and evaluation methods, but this information may not be available in sufficient time to be resolved by August 5<sup>th</sup>.

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